

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

DANA UNDIES, INC.,
Individually and on behalf of all others similarly
situated,

Plaintiff,

-against-

COATS PLC; COATS NORTH AMERICA DE
REPUBLICA DOMINICANA, INC.; WILLIAM
PRYM GMBH & CO., KG; PRYM CONSUMER
USA, INC.; PRYM FASHION, INC.; SCOVILL
FASTENERS, INC.; YKK CORPORATION; YKK
CORPORATION OF AMERICA, INC.; YKK
(U.S.A.) INC.; and YKK SNAP FASTENERS
AMERICA, INC.,

Defendants.

INDEX NO. 07-CV-10340

**MOTION TO ADMIT COUNSEL
PRO HAC VICE**

PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the
Southern and Eastern Districts of New York, I, David S. Stellings, a member in good standing of
the bar of this Court, hereby move for an Order allowing the admission pro hac vice of:

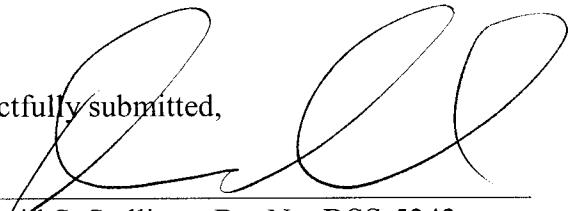
Joseph R. Saveri
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
Embarcadero Center West
275 Battery Street, 30th Floor
San Francisco, California 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008

Joseph R. Saveri is a member in good standing of the Bar of the State of California. There is no
pending disciplinary proceeding against Joseph R. Saveri in any State or Federal Court.

Dated: December 12, 2007
New York, New York

Respectfully submitted,

By:


David S. Stellings, Bar No. DSS-5343

LIEFF, CABRASER, HEIMANN &
BERNSTEIN, LLP
780 Third Avenue, 48th Floor
New York, New York 10017-2024
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THE STATE BAR OF CALIFORNIA

MEMBER SERVICES CENTER

180 HOWARD STREET, SAN FRANCISCO, CALIFORNIA 94105-1639

TELEPHONE: 888-800-3400

December 3, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, JOSEPH RICHARD SAVERI, #130064 was admitted to the practice of law in this state by the Supreme Court of California on December 11, 1987; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA

A handwritten signature of Kath Lambert.
Kath Lambert
Custodian of Membership Records

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INDEX NO. 07-CV-10340

**AFFIDAVIT OF DAVID S.
STELLINGS IN SUPPORT OF
PRO HAC VICE APPLICATION**

State of New York)
)
 ss:
County of New York)

DAVID S. STELLINGS declares under penalty of perjury:

1. I am a member of the law firm of Lieff, Cabraser, Heimann & Bernstein,
LLP, counsel for Plaintiff in the above-captioned action. I am familiar with the proceedings in
this case. I make this statement based on my personal knowledge of the facts set forth herein and
in support of Plaintiff's motion to admit Joseph R. Saveri as counsel pro hac vice to represent
Plaintiff in this matter.

2. I am a member in good standing of the bar of the State of New York and
have been admitted to practice in the Southern District of New York since February, 1996.

3. Joseph R. Saveri is a member of Lieff, Cabraser, Heimann & Bernstein, LLP, Embarcadero Center West, 275 Battery Street, 30th Floor, San Francisco, California 94111-3339.

4. Mr. Saveri is admitted to practice before the Bar of the State of California and is in good standing. The certificate of good standing with respect to Mr. Saveri is annexed as Exhibit A.

5. Mr. Saveri has not been subjected to discipline by any court and no disciplinary charges are currently pending against him.

6. Mr. Saveri is fully familiar with the individual rules of this Court and the local rules of the United States District Court for the Southern District of New York.

Dated: December 3, 2007
New York, New York

Notarized:



Respectfully submitted,
By:
David S. Stellings, Bar No. DSS-5343

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SOUTHERN DISTRICT OF NEW YORK**

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Defendants.

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**ORDER FOR ADMISSION
PRO HAC VICE**

Upon the motion of David S. Stellings, attorney for Dana Undies, Inc., and said sponsor
attorney's affidavit in support;

IT IS HEREBY ORDERED that

Joseph R. Saveri
LIEFF, CABRASER, HEIMANN & BERNSTEIN, LLP
Embarcadero Center West
275 Battery Street, 30th Floor
San Francisco, California 94111-3339
Telephone: (415) 956-1000
Facsimile: (415) 956-1008
jsaveri@lchb.com

is admitted to practice pro hac vice as counsel for Dana Undies, Inc., in the above-captioned case
in the United States District Court for the Southern District of New York. All attorneys
appearing before this Court are subject to the Local Rules of this Court, including the Rules

governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated: December ___, 2007
New York, New York

United States District Court Judge

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on this day, December 10, 2007, true and correct copies of the following

- Motion to Admit Joseph R. Saveri Pro Hac Vice
- Affidavit of David S. Stellings in Support of Motion to Admit Joseph R. Saveri Pro Hac Vice
- Proposed Order Admitting Joseph R. Saveri Pro Hac Vice

were served by First Class U.S. Mail on the following:

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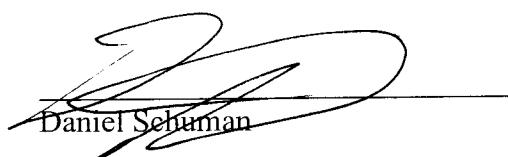
Attorneys for Defendants Prym Consumer
USA, Inc. and Prym Fashion, Inc.

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America, Inc.



Daniel Seluman